UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

TOXICS ACTION CENTER, INC. and CONSERVATION LAW FOUNDATION,)))
Plaintiffs)
v.) Case No. 1:18-cv-00393-PB
CASELLA WASTE SYSTEMS, INC. and NORTH COUNTRY ENVIRONMENTAL SERVICES, INC.,)))
Defendants)))

JOINT MOTION TO EXTEND DEADLINE TO FILE SETTLEMENT AGREEMENT

Plaintiffs Toxics Action Center, Inc., and Conservation Law Foundation and Defendants North Country Environmental Services, Inc., and Casella Waste Systems, Inc. (collectively, "the Parties") respectfully move the Court to extend the deadline for filing a stipulated settlement agreement and order by 30 days, until January 11, 2022. In support of this motion, the Parties state as follows:

- 1. On September 23, 2021, the Court suspended the procedural schedule in this case to enable the parties to negotiate a settlement. ECF No. 111.
- 2. After the Parties notified the Court that they had reached a settlement in principle, the Court on November 12, 2021, ordered the Parties to file an agreement for entry of judgment or a stipulation of dismissal within 30 days.
- 3. The Parties have been diligently working to draft a stipulated settlement agreement and order that embodies their agreement in principle and resolves all claims in this

case, but they need additional time to finalize the agreement and accommodate any delays caused by the upcoming holiday season.

4. The Parties therefore seek a 30-day extension of the Court's deadline, which they believe will provide sufficient time for them to finalize and file their settlement agreement.

WHEREFORE, the Parties jointly and respectfully request that this Court grant the following relief:

Date: December 8, 2021

Extend the deadline for the Parties to file a stipulated settlement agreement and order to January 11, 2022.

Respectfully submitted,

NORTH COUNTRY ENVIRONMENTAL SERVICES, INC. and CASELLA WASTE SYSTEMS, INC., By Their Attorneys,

/s/ Coolev A. Arrovo

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/s/ Joshua R. Kratka

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CERTIFICATE OF SERVICE

I hereby certify that the within pleading is being served electronically upon all counsel of record through the court's ECF system.

Date: December 8, 2021 /s/ Joshua R. Kratka
Joshua R. Kratka